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13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 U.S. EQUAL EMPLOYMENT
16 OPPORTUNITY COMMISSION,

17 Plaintiff,
18 vs.

19 NEVADA RESTAURANT SERVICES, INC.,
and DOES 1-10, inclusive,

20 Defendants.

Case No.: 2:23-cv-01307-GMN-NJK

**JOINT NOTICE OF SETTLEMENT; AND
SECOND STIPULATION FOR A STAY OF
PROCEEDINGS TO FINALIZE CONSENT
DECREE; ORDER**

(SECOND REQUEST FOR A STAY)

TO THE HONORABLE DISTRICT JUDGE AND MAGISTRATE JUDGE:

Plaintiff U.S. Equal Employment Opportunity Commission and Defendant Nevada Restaurant Services, Inc. (collectively “Parties”), by and through their counsel of record, jointly file this Notice of Settlement and second stipulation to stay proceedings.

On December 12, 2024, the court granted the Parties’ stipulation to stay proceedings for a period of ninety days for a mediation in February 2025 to resolve the case. (ECF No. 48).

On February 27, 2025, the Parties, through mediation, reached agreement on a monetary settlement. The Parties will need additional time to finalize the language of a proposed Consent Decree and Order for the Court’s consideration, approval, and entry. The Parties anticipate submitting the proposed Consent Decree and Order within forty-five (45) days. If the proposed Consent Decree and Order are not filed within forty-five (45) days of the Order, the Parties shall file a Joint Status Report Regarding Settlement.

In the interest of preserving costs for continuing discovery and trial preparation and in the interest of judicial economy, the Parties respectfully request that the Court retain jurisdiction to enter decree and stay the proceedings for forty-five (45) days from the date of the Order to allow the Parties to finalize and to submit the Consent Decree and Order for the Court’s approval and entry.

Dated: March 5, 2025

U.S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION

By: /s/ Derek W. Li
Derek W. Li
EEOC Trial Attorney

Dated: March 5, 2025

NEVADA RESTAURANT SERVICES, INC.

By: /s/ Richard J. Mrizek
Kirsten A. Milton, ESQ.
Richard J. Mrizek, ESQ.
JACKSON LEWIS P.C.
Attorneys for Defendant
Nevada Restaurant Services, Inc.

[PROPOSED] ORDER

IT IS SO ORDERED.

Dated this ____ day of March, 2025

Gloria M. Navarro, District Judge
UNITED STATES DISTRICT JUDGE